# EXHIBIT G

Supplement to the Declaration of Duncan A. Buell

February 1, 2022

## IN THE UNITED STATES DISTRICT COURT FOR THE NORTHERN DISTRICT OF GEORGIA ATLANTA DIVISION

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| DONNA CURLING, et al.<br><br>Plaintiff,<br><br>vs.<br><br>BRAD RAFFENSPERGER, et al.<br><br>Defendant. | ) ) ) ) ) ) ) ) ) ) ) ) **CIVIL ACTION FILE NO.:**<br>**1:17-cv-2989-AT** |

## SUPPLEMENT TO THE DECLARATION OF DUNCAN A. BUELL

DUNCAN A. BUELL ("Declarant") hereby declares as follows:

1.   This is a supplement to my declaration of 11 January 2022.  I incorporate by reference all the preliminary information on my credential, background, and history in the analysis of election data and my time spent as an election official in Richland County, South Carolina.

### Data Analysis

2.   I received in early- or mid-June a data disk from Dr. Alex Halderman.  This included various kinds of data from the November 2020 General Election and the January 2021 runoff election.  Although I cannot say exactly when the data became available, looking at the file metadata, the earliest creation date I can see for county data from Georgia seems to be 11 June 2021.

3.    The original data I obtained from Dr. Halderman did not include data for Fulton County.  Based on file creation dates on my computer, I obtained two copies of the "original" data and one copy of the recount data on 18 December 2021.  These files included the "manifest" files for candidate identifiers, ballot styles, precincts, and also the JSON cast vote record (CVR).

4.    The files I received, apparently in the middle of December, are the files necessary to process what one would assume to be the official CVR.  I received some of these files for some counties in the original data provided in June, but received complete data for perhaps only a handful of counties.

5.    The data I received totaled, if memory serves, perhaps 800 gigabytes.  I cannot without some effort provide an exact number, and an exact number might not be meaningful.  Some data came in zip files, and some did not.  In several counties I unzipped the zip files, but kept the zip file in case it would be needed later; this would not quite double count the size.  For Fulton County, the JSON files are about 2-1/2 gigabytes, but that is only for text.  The image files will take up much more space.  My images for Fulton County take up about 70 gigabytes of space, for example.

6.    Processing the CVR with computer programs is not actually difficult, although it requires some care.  The JSON data for the CVR is encoded (no doubt to save space), and the manifest files mentioned above are necessary to fully understand, in a human readable form, what the interpretation of the data should be.  For example, candidates are given an ID number, and it is that number one uses in the lookup table that is the Candidate Manifest.  The three candidates for President from the Republican,

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Democratic, and Libertarian parties, for example, had ID numbers 1, 2, and 3, and these are the code numbers to look up name, political party, and such from the the Candidate Manifest.

7.   According to the Secretary of State's official site, the number of ballots cast in the Cobb County November 3 presidential original count was 393,746.  The number of ballots cast in Fulton County on Election Day and in Early Voting for president was 206,137.

8.   I have relied on Coalition Plaintiffs' consulting expert Harvie Branscomb, who has been working with me using the CVR and the database files for determinations of the number of missing files in the electronic records received from Fulton County. The numbers are consistent with the Fulton records I have personally examined.  Mr. Branscomb has determined that there are approximately 18,000 missing electronic records from the Election Project Package in the Fulton November 2020 presidential recount, and that 750 of the missing files are from Fulton Plaintiffs and Coalition for Good Governance members' Fulton home precincts.  For example, he has determined that 418 presidential recount images are missing from RW01 precinct, and 179 are missing from 06J.

9.   Based on the Secretary of State's official site and the understanding that Fulton County's ballot images were not preserved for Election Day voting and Early Voting for the original county, there would be 2773 images not preserved in RW01 and 1375 not preserved in 06J.  Adding in the missing images from the recount, as stated

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above, then there would be 3191 images from RW01 and 1554 from 06J that are unavailable for review.

10.  Using the JSON CVR, I have verified that 7 ballots with tif file names 00794_00017_000024, 00791_00019_000010, 00791_00026_000091, 00794_00017_000029, 00791_00019_000015, 00791_00026_000086, 00794_00018_000001, 00791_00019_000092, 00791_00026_000009, 00794_00018_000011, 00791_00019_000082, 00791_00026_000019, 00794_00019_000002, 00791_00019_000022, 00791_00026_000079, 00794_00019_000005, 00791_00019_000025, 00791_00026_000076, 00794_00019_000006, 00791_00019_000026, 00791_00026_000075, were counted three times in the official count, and at least 6 ballots, tif file names 00801_00044_000042, 00801_00043_000042, 00801_00044_000083, 00801_00043_000083, 00801_00044_000168, 00801_00043_000168, 05160_00074_000023, 05160_00067_000008, 05160_00101_000002, 05160_00097_000006, 05160_00101_000017, 05160_00098_000002,, were counted twice in the official count of RW01 results.  In precinct 06J, I have verified that at least 7 ballots, tif file names 00794_00020_000012, 00791,00028,000004, 00794_00020_000017, 00791_00028_000009, 00794_00020_000023 00791_00028_000015, 00794_00022_000004, 00791_00030_000008, 00794_00022_000015, 00791_00029_000037, 00794_00024_000014, 00791_00031_000024, 00794_00025_000001, 00791_00031_00002, were counted twice

## Summary and Conclusions

I declare under penalty of perjury, in accordance with 28 U.S.C. § 1746, that the foregoing is true and correct.

Executed on this date, February 1, 2022.

DUNCAN ALAN BUELL

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